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January 18, 2000

Dockets Facility, U.S. Department of Transportation, Room PL-40 1  
400 Seventh Street SW  
Washington DC 20590-0001

**RE: {Docket No. RSPA-99-6355; Notice 1 }**  
**Pipeline Safety: Enhance Safety and Environmental Protection for**  
**Gas Transmission and Hazardous Liquid Pipelines in**  
**High Consequence Areas**

Dear Sir/Madam;

Tuscarora Gas Transmission Co. (TGTC) is engaged in the transportation of natural gas in the states of Oregon, California, and Nevada. TGTC is a FERC regulated natural gas transportation pipeline system, with approximately 229 miles of transmission pipeline.

On November 18, 1999 INGAA made a presentation at the Public Meeting (64 Fed Reg. 56570, October 20, 1999), hosted by OPS in the above-referenced docket. INGAA made the following recommendations:

- OPS and state pipeline safety agencies should communicate to the public their present inspection process as well as the new initiatives;
- The present joint initiatives should be completed, documented and successes integrated into the regulatory structure before any new initiative is started; and
- A joint public safety education effort should be established.

TGTC is in favour of managing pipeline integrity and has always supported efforts in regulations that foster commitment to increase safety to the public, employees, and environment. TGTC believes that performance oriented, risk-based rule building upon the existing integrity measures incorporated into 49CFR192 will effectively address pipeline safety concerns, rather than a wholly prescriptive integrity management rule, such as insisting on performing on-line inspections.

TGTC is committed to maintaining the integrity of its pipelines through working with regulators, the communities and other stakeholders and supports the modification of the pipeline safety regulations and the development of an industry integrity standard. TGTC recommends a "best practices" approach to arrive at a realistic risk management standard.

TGTC appreciates the opportunity to comment on this very important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Theo van Besouw', is written over a horizontal line.

**TUSCARORA GAS TRANSMISSION Co.**

Theo van Besouw

Director, Engineering and Operations